

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

CHARLIE JAVICE and OLIVIER AMAR,

Defendants.

Case No.: 1:23-cr-00251-AKH

**DEFENDANTS' PROPOSED
*VOIR DIRE QUESTIONS***

PRELIMINARY STATEMENT

Defendants Charlie Javice and Olivier Amar, through their undersigned counsel, respectfully request that the Court ask the following *voir dire* questions to prospective jurors during jury selection in this case. Pursuant to the Court's directive at the conference held on September 23, 2024, Defendants' proposed voir dire questions focus on questions or sensitivities specific to this case with the understanding that the Court will question jurors in its usual manner regarding personal background, ability to serve as a juror, knowledge of participants, and certain legal principles.

PROPOSED VOIR DIRE QUESTIONS

1. Have you or someone close to you ever worked at a tech "start-up" company? If yes, which company, for how long, in what position or positions, and what were the job duties?
2. Have you or someone close to you ever worked at a bank or financial institution? If yes, which banks or financial institution, for how long, in what position or positions, and what were the job duties?
3. Do you have any experience with analyzing data related to Internet website activity or engagement, such as Google Analytics? If yes, please describe your experience and the website metric-tracking tools you are most familiar with.
4. Do you or someone close to you have any experience or exposure to mergers and acquisitions of companies, or put another way, with buying or selling companies of any size? If yes, please explain the transaction and your role in it.

5. Do you believe that it is common for companies to exaggerate their accomplishments or claims about their products to attract customers or investors? If yes, does that practice concern you? Please describe your concerns.
6. Do you feel that senior-level executives of a company should be knowledgeable about most areas of their business? Are there any areas you think they may not be very knowledgeable about?
7. Have you ever been involved in a transaction, as the purchaser or seller, where the purchaser or seller felt misled after the transaction? If yes, please explain.
8. Have you read or heard about any criminal cases involving “start-up” companies founded by young entrepreneurs? If yes, which case or cases? Through which source of news (e.g., specific newspapers, cable news networks, internet news sites)? What were your impressions?
9. Have you or someone close to you ever been the victim of any kind of fraud?
10. Have you or anyone close to you ever been accused of any kind of fraud? Have you ever worked for a company that was accused of fraud or some other wrongdoing?
11. Do you have any concerns about privacy or the collection and use of personal information and data by companies? If yes, please describe the nature of your concerns.
12. Do you have any experience in purchasing personal data for marketing purposes, such as direct mailing lists or direct email lists?
13. Do you have any feelings about what’s going on in the Middle East right now that might negatively affect your feelings about Israel or Jewish people?
14. If you are employed, do you use any electronic messaging platforms to communicate with coworkers? Slack? WhatsApp? Other? How regularly do you use such messaging platforms to communicate with colleagues?
15. If you are employed, do you use any video conferencing technology to communicate with coworkers? Zoom? Microsoft Teams? WebEx? Google Meet? Other? How regularly do you communicate with colleagues using video conferencing technology?
16. If you are employed, do you use any Google tools to draft, maintain, and revise documents? Google Drive? Google Sheets? Others? How regularly do you use these tools?

CONCLUSION

For all these reasons, Ms. Javice and Mr. Amar respectfully request the Court ask the following *voir dire* questions to prospective jurors during jury selection in this case.

Dated: January 13, 2025

Respectfully submitted,

**QUINN EMANUEL URQUHART
& SULLIVAN, LLP**

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CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2025, I caused a copy of the foregoing document to be served via ECF on counsel of record.

/s/ Sean S. Buckley